

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DEIDRA HABBEH HALL,)	
)	
Plaintiff,)	
)	
vs.)	13 CV 7404
)	
TRANS STATES HOLDINGS, INC.,)	Honorable Sharon Johnson Coleman
TRANS STATES AIRLINES, and)	
GOJET AIRLINES,)	Magistrate Judge Sheila M. Finnegan
)	
Defendants.)	

**PLAINTIFF’S MOTION TO VOLUNTARILY
DISMISS DEFENDANTS TRANS STATES
HOLDINGS, INC. AND TRANS STATES AIRLINES**

Plaintiff, Deidra Habeeb Hall, in support of her Motion to Voluntarily Dismiss Defendants Trans States Holdings, Inc. and Trans States Airlines, states as follows:

1. At all times relevant to Plaintiff’s complaint, she was employed by GoJet Airlines as a flight attendance based out of O’Hare International Airport. Plaintiff complains, in part, that her employer interfered with her rights under the Family and Medical Leave Act (“FMLA”), 29 U.S.C. § 2615, and retaliated against her.

2. One element that plaintiff must prove under the FMLA is that her employer is covered by the FMLA. To be covered, and employer must employ at least 50 employees within a 75 mile radius.

3. Upon information and belief, Trans States Airlines and GoJet Airlines are wholly-owned subsidiaries of Trans States Holdings, therefore, plaintiff named them as defendants under the theory that they are “joint employers,” to establish that GoJet Airlines is a covered employer under the FMLA

4. Pursuant to an agreement between the parties, GoJet Airlines does not contest that it has at least 50 employees within 75 miles of O'Hare International Airport

5. Accordingly, Plaintiff has agreed to voluntarily dismiss, with prejudice, Defendants Trans States Holdings, Inc. and Trans States Airlines.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an order dismissing Trans States Holdings, Inc. and Trans States Airlines as defendants, and grant such other relief as the Court deems appropriated.

Dated: March 11, 2014

Deidra Habeeb Hall, Plaintiff

By: /s/ Julie E. Diemer
Her Attorney

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